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August 28, 2019

**VIA EMAIL & FEDEX**

Susan E. Weiner, Esq.  
Executive VP & General Counsel  
NBC Universal  
30 Rockefeller Plaza  
New York, New York 10112  
Email: susan.weiner@nbcuni.com

**VIA EMAIL, FAX & FEDEX**

Daniel M. Kummer, Esq.  
Senior Vice President, Litigation  
NBC Universal Media, LLC  
30 Rockefeller Plaza, Rm. 1091E  
New York, New York 10112  
Email: daniel.kummer@nbcuni.com  
Fax (212) 664-6572

**Re: President Donald J. Trump, The Trump Organization –  
Demand for Retraction, Correction and Apology**

Dear Ms. Weiner and Mr. Kummer:

This law firm is litigation counsel for President Donald J. Trump (“Mr. Trump”) and The Trump Organization (“Trump Org.”). We write concerning the false and defamatory statements published by Lawrence O’Donnell and NBC Universal (“NBCU”) (collectively, “you” and “your”) about Mr. Trump and Trump Org. in an episode of the program, *The Last Word with Lawrence O’Donnell*, which was broadcasted on or about August 27, 2019 (the “Program”), and also published by Mr. O’Donnell and NBCU in a tweet posted on that same date (the “Tweet”). The Program and Tweet make the false and defamatory statements that “Russian oligarchs” co-signed loans provided to Mr. Trump by Deutsche Bank, and described these “co-signers” as “Russian billionaires close to Vladimir Putin.”

These statements are false and defamatory, and extremely damaging. The only borrowers under these loans are Trump entities, and Mr. Trump is the only guarantor. Numerous documents for each of these loans are also recorded, publicly available and searchable online. Thus, actual malice can easily be proven based on your reckless disregard of the truth and unreasonable reliance on an alleged “source” who you will not even identify in your story and likely is seeking to mislead you and the public for political reasons or other ulterior motives.<sup>1</sup>

**Demand is hereby made** that Mr. O’Donnell and NBCU **immediately and prominently** retract, correct and apologize for the aforementioned false and defamatory statements.

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<sup>1</sup> Nothing herein shall constitute an admission that Trump Org. is a public figure or required to show actual malice.

Ms. Weiner & Mr. Kummer

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You are officially on notice of this dispute and are required to undertake steps to affirmatively preserve, and not delete, any and all physical and electronic documents, materials, information, and data, including without limitation all emails, text messages, instant messages (IMs), letters, memoranda, handwritten notes, typewritten notes, charts, summaries, financial information, audio and/or video recordings and footage, still images, photographs, etc. that pertain in any way to Mr. Trump, Trump Org., the Program, the Tweet, and any and all statements made therein, and/or might otherwise be relevant or related to the foregoing matters. All sources of documents, materials, information, and data should be preserved, including without limitation, physical files, electronic and digital files, computer servers, email servers, backup tapes, cloud storage, personal computers, hard drives, smart phones, tablets, and other types of storage devices including external drives, thumb drives, zip drives, disks and DVDs.

Please confirm in writing **within twenty-four (24) hours** of the transmission of this letter that Mr. O'Donnell and NBCU will **immediately and prominently retract, correct and apologize** for the aforementioned false and defamatory statements. Failure to do so will leave my clients with no alternative but to consider their legal options which could include immediate legal proceedings against Mr. O'Donnell and NBCU. Should that occur, my clients would pursue all available causes of action and seek all available damages and other legal remedies to the maximum extent permitted by law. Naturally, all of my clients' rights and remedies are hereby expressly reserved, and none are waived.

Sincerely,



CHARLES J. HARDER Of  
**HARDER LLP**

cc: Alan Garten, Esq.  
Ryan Stonerock, Esq.  
Lan P. Vu, Esq.  
Steven Frackman, Esq.